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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JANET GARCIA, et al.

Plaintiffs,

v.

CITY OF LOS ANGELES,

Defendant.

Case No.: 2:19-cv-6182-DSF-PLA  
[Assigned to Judge Dale S. Fischer]

**DISCOVERY MATTER**

**DECLARATION OF THERESA  
CARTER ISO CITY'S OPPOSITION  
TO PLAINTIFFS' MOTIONS TO  
COMPEL DISCOVERY**

Date: April 28, 2021

Time: 10:00 a.m.

Crtm: 780

Complaint Filed: July 18, 2019

Discovery Cut-Off: July 26, 2021

Pretrial Conference: Feb. 14, 2022

Trial Date: March 15, 2022

**DECLARATION OF THERESA CARTER**

**DECLARATION OF THERESA CARTER**

I, THERESA CARTER, hereby declare:

1. I currently work for City of Los Angeles, Los Angeles Police Department (LAPD), as a Police Administrator I, and am the Commanding Officer for the Records & Identification Division and Custodian of Records for the Department. I have personal knowledge of the facts contained herein, and if called to testify I could and would do so competently.

2. LAPD officers generate Release From Custody Records on two occasions. First, when a person is arrested and they are immediately released from custody in the field. Second, when a person is arrested and they are released after the booking process. As explained below, the LAPD stores Release from Custody Forms (RFCs) for persons arrested for violations of Los Angeles Municipal Code section 56.11.

3. I understand that the City received a request which calls for the production of RFCs related to Los Angeles Municipal Code 56.11 for the time period of April 1, 2016 through the present, which for this purpose I am using a date of March 20, 2021.

4. LAPD stores the original RFCs in hard copies and maintains a database called the Consolidated Crime Analysis Database (CCAD) that contains the digital format of this information. For the relevant time period, LAPD has approximately 120,622 RFCs that would need to be located and hand searched to identify the approximately 3,808 RFCs related to LAMC 56.11.

5. Assuming it would take a Senior Administrative Clerk approximately 1 minute to hand search each of the 120,622 RFCs and cross reference them against the list of 3,808 RFCs relating to LAMC 56.11, with an additional 3 minutes to separate and copy each RFC, that would take 132,046 minutes, and an additional 4,800 minutes (80 hours) to locate, receive, and return boxes from storage, for a total of 136,846 minutes (or approximately 95 days). This translates into some 285 days of staff working an 8 hour shift to hand search 120,622 RFCs to locate and copy the requested 3,808 RFCs relating to LAMC 56.11. Due to staff shortages and backlogs, the search would have to be done

1 on a cash overtime basis at 1.5% by an LAPD employee. The approximate cost of this,  
2 for one Senior Administrative Clerk, is \$117,550 (2,280.77 hours \* \$34.36 per hour \*  
3 1.5%).  
4

5 I declare under penalty of perjury under the laws of the State of California and the  
6 United States that the foregoing is true and correct and that this Declaration was executed  
7 on March 30, 2021, at Los Angeles, California.  
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10 THERESA CARTER  
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